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Attorney for Defendant,
FORD MOTOR CREDIT COMPANY LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 || GEORGE A. WAGNER,

Plaintiff,

VS.

14 FORD MOTOR CREDIT COMPANY LLC,
15 UNIVERSAL PAYMENT CORPORATION,
16 WESTSTAR CREDIT UNION, EQUIFAX
INFORMATION SERVICES LLC AND
EXPERIAN INFORMATION SOLUTIONS,
INC.

17 Defendants.

Case No.: 2:18-cv-00173-APG-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER OR
OTHERWISE PLEAD**

19 COMES NOW, Defendant, FORD MOTOR CREDIT COMPANY LLC, (“Defendant”)
20 by and through its attorney of record, GARY E. SCHNITZER, ESQ., of the law firm of
21 KRAVITZ, SCHNITZER & JOHNSON, CHTD., and the Plaintiff, GEORGE A. WAGNER, by
22 and through his attorneys of record, MICHAEL KIND, ESQ., of the law firm of KAZEROUNI
23 LAW GROUP, APC, and hereby submit this Stipulation to Extend Time To File An Answer or
24 Otherwise Plead.

25 WHEREAS, Plaintiff filed his Complaint on January 31, 2018;

WHEREAS, Defendant was served with the Complaint on February 7, 2018;

11

1 WHEREAS, Defendant's initial deadline to file its Answer to the Complaint was
2 approximately February 28, 2018;

3 WHEREAS, Defendant received an Extension up to and including March 15, 2018 to file
4 its Response;

5 WHEREAS, Defendant is still in the process of obtaining proper documents in order to
6 address specific allegations made in Plaintiff's Complaint;

7 WHEREAS, the parties seek up to and including March 22, 2018 for Defendant to file its
8 Response. Plaintiff has no opposition to this extension;

9 WHEREAS, this is the second request by the Parties seeking such extension;

10 THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY
11 STIPULATED AND AGREED by and between the Parties as follows:

12 Defendant, FORD MOTOR CREDIT COMPANY LLC shall have up to and including
13 March 22, 2018 to file an Answer or Otherwise Plead to Plaintiff's Complaint.

15 **IT IS SO STIPULATED.**

16 DATED this 15th day of March, 2018.

17 */s/ Michael Kind, Esq.*

18 Michael Kind, Esq.
19 Nevada Bar No. 13903
20 KAZEROUNI LAW GROUP, APC
21 6069 South Fort Apache Road, Suite 100
22 Las Vegas, NV 89148
23 *Attorney for Plaintiff*
24 **GEORGE A. WAGNER**

17 */s/ Gary E. Schnitzer, Esq.*

18 Gary E. Schnitzer, Esq.
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21 8985 S. Eastern Ave., Ste. 200
22 Las Vegas, NV 89123
23 *Attorney for Defendant*
24 **FORD MOTOR CREDIT COMPANY LLC**

23 **IT IS ORDERED.**

25 DATED this 20th day of March, 2018.

26 
27 United States Magistrate Judge